

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JEFFERSON-PILOT INSURANCE)
COMPANY,)
Plaintiff,)
-vs-) CASE NO. C-1-02-479
CHRISTOPHER L. KEARNEY,)
Defendant.)

DEPOSITION OF CLINTON E. MILLER

DATE: Monday, May 3, 2004
TIME: 10:05 a.m.
LOCATION: PARAGON REPORTING SERVICES
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1 duplicated. Fair enough?

2 A. By the court reporter.

3 Q. Absolutely.

4 A. I want the court reporter to do everything.

5 Q. That's fine.

6 A. Okay. We're in agreement.

7 Q. Okay. Good.

8 (Plaintiff's Exhibit C was marked for
9 identification, the original of which is
10 retained by the deponent.)

11 BY MR. ELLIS: Q. What other information
12 did you have besides the binder or is that it?

13 A. I didn't date everything. In any event, I have
14 the Claim Administration Principles and Practices on
15 claims. Just one moment, please.

16 Q. Uh-huh.

17 A. This is a professional organization outlining
18 the principles of good faith, processing of claims.

19 Q. This appears to be copies of a chapter from a
20 book or at least parts of a chapter from a book; is
21 that correct?

22 A. It appears so.

23 Q. Do you know the author of this chapter?

24 A. Not off the top of my head.

25 Q. Do you know the source of this book, Principles